

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG. PHILIPS LCD CO., LTD.,	§	
Plaintiff,	§	
v.	§	C.A. No. 06-726-GMS
CHI MEI OPTOELECTRONICS CORPORATION; AU Optronics CORPORATION; AU Optronics CORPORATION OF AMERICA; TATUNG COMPANY; TATUNG COMPANY OF AMERICA, INC.; AND VIEWSONIC CORPORATION,	§	
Defendants.	§	
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AU Optronics CORPORATION,	§	
Plaintiff,	§	
v.	§	C.A. No. 07-357-JJF
LG. PHILIPS LCD CO., LTD. and LG. PHILIPS LCD AMERICA, INC.	§	
Defendants.	§	

**JOINT MOTION TO CONSOLIDATE**

AU Optronics Corporation (“AUO”), and AU Optronics Corporation America (“AUOA”), LG.Philips LCD Co., Ltd. (“LPL”), and LG.Philips LCD America, Inc. (“LPLA”), (collectively, the “movants”) hereby jointly move the Court, pursuant to Federal Rule of Civil Procedure 42, for consolidation of Civil Action No. 07-357-JJF (the “07-357 action”), which was recently transferred to this Court from the Western District of Wisconsin, with Civil Action No. 06-726-GMS (“the 06-726 action”) for pre-trial proceedings and trial. All of the parties to the 07-357 action are already involved in the 06-726 action. The movants present the following in support of this motion:

1) On December 1, 2006, LPL initiated the 06-726 action by suing six entities, including AUO and the additional counterclaim defendants to the 07-357 action, for infringement of three LPL patents.

2) On March 8, 2007, AUO initiated what is now the 07-357 action in the Western District of Wisconsin by suing LPL and LPLA for infringement of three AUO patents.

3) On April 11, 2007, LPL amended its complaint in the 06-726 action to seek declaratory judgments of non-infringement and invalidity against the AUO patents asserted in Wisconsin. Since then, AUO has asserted infringement of the AUO patents as counterclaims in the 06-726 action. Thus, the 07-357 action and the 06-726 action include common issues, including infringement or non-infringement and validity or invalidity of these three AUO patents.

4) On April 16, 2007, LPL and LPLA moved to transfer what is now the 07-357 action from the Eastern District of Wisconsin to the District of Delaware. On May 30, 2007, the Wisconsin Court granted LPL and LPLA's motion. In granting the motion, the Court held that, "The interest of justice would be best served by transferring this case to the United States District Court of Delaware where consolidation is feasible." Order at 6 (citing *Trafficast, Inc. v. Pritchard*, 2005 WL 3002267 (W.D. Wisc. 2005)).

5) Consolidation of the transferred action with the 06-726 action will prevent the problems and inefficiencies that could arise from two actions on related technology between the same parties, including, for example, inconsistent rulings, empanelling multiple juries to hear the same evidence, and multiple international trips for the same witnesses whether for deposition or trial.

6) Accordingly, the movants respectfully ask that the 07-357 action be consolidated with the 06-726 action.

Dated: July 6, 2007

**YOUNG CONAWAY STARGATT & TAYLOR LLP**

*/s/ Karen L. Pascale*

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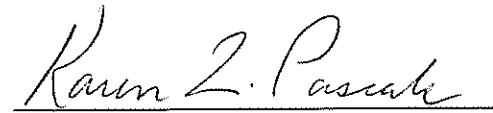
**LOCAL RULE 7.1.1 STATEMENT**

I, Karen L. Pascale, Esquire, hereby certify pursuant to D. Del. LR 7.1.1, as follows:

1. Counsel for movant AU Optronics Corporation contacted counsel for Chi Mei Optoelectronics Corporation and Chi Mei Optoelectronics USA, Inc. (collectively, "CMO") (specifically, pro hac vice counsel of record for those parties in C.A. No. 06-726-GMS), and was advised that CMO will not join in the motion to consolidate and will not oppose the motion.

2. Counsel for movant AU Optronics Corporation contacted counsel for Tatung Company and Tatung Company of America (collectively, "Tatung") on June 26, 2007 (specifically, pro hac vice counsel of record for those parties in C.A. No. 06-726-GMS), and Tatung has not yet indicated whether or not it will oppose the motion. Tatung reserves the right to file an opposition.

3. Counsel for movant AU Optronics Corporation contacted counsel for ViewSonic Corporation ("ViewSonic") on June 26, 2007 (specifically, pro hac vice counsel of record for ViewSonic in C.A. No. 06-726-GMS), and ViewSonic's counsel has indicated that ViewSonic will be filing a response to the motion, but is still determining exact content of the response. Among other things, ViewSonic may be suggesting procedural alternatives to consolidation. Under the circumstances, therefore, it is probably not accurate to say that ViewSonic does not oppose the motion.

  
Karen L. Pascale (#2903)

**CERTIFICATE OF SERVICE**

I, Karen L. Pascale, Esquire, hereby certify that on July 6, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that I caused a copy of the foregoing document to be served by e-mail and hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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